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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

United States of America,

Plaintiff,

v.

Tyree Walker,

Defendant.

Case No. 2:20-cr-00126-APG-VCF

**Emergency Motion to Modify
Conditions of Pretrial Release**

Section 3142(c)(3) of Title 18 of the United States Code gives courts authority to amend or impose additional or different conditions of release at any time after consideration of the release factors under the Bail Reform Act. Tyree Walker has been on pretrial release in this arson case—his first felony offense—for nearly six months during which he has been fully compliant.

Walker’s bond restricts his travel to Clark County, Nevada.¹ Walker requests that his bond be modified to permit him to travel to Saginaw, Michigan, from December 7–14, 2020, to attend the funeral service of his grandfather and to visit family. Walker’s bond further establishes Walker’s uncle, James Edward Edrby, Jr., as his third-party custodian. Walker will be traveling to Michigan

¹ ECF No. 63 at 2.

1 with his uncle, so he will be under the watchful eye of his third-party custodian
2 during this trip. The purpose of this trip, the supervision by Walker's third-party
3 custodian, the trip's limited duration, and Walker's success while on pretrial
4 supervision to date all support granting this request. So that Walker and his
5 family can make travel arrangements as soon as possible, he respectfully
6 requests an expedited ruling on this request.

7 DATED: December 1, 2020

8 Rene L. Valladares
9 Federal Public Defender

10 By: /s/ Erin Gettel

11 Erin M. Gettel
12 Assistant Federal Public Defender
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CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that he is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on December 1, 2020, he served an electronic copy of the above and foregoing Emergency Motion to Modify Conditions of Pretrial Release by electronic service (ECF) to the person named below:

NICHOLAS A. TRUTANICH
United States Attorney
STEPHANIE N. IHLER
Assistant United States Attorney
501 Las Vegas Blvd. South
Suite 1100
Las Vegas, NV 89101

/s/ *Brandon Thomas*
Employee of the Federal Public
Defender